

# EXHIBIT 8

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA

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THE CITY OF HUNTINGTON,

Plaintiff,

v.

CIVIL ACTION NO. 3:17-01362

AMERISOURCEBERGEN DRUG

CORPORATION, et al,

Defendants.

CABELL COUNTY COMMISSION,

Plaintiff,

vs.

AMERISOURCEBERGEN DRUG

CORPORATION, et al,

Defendants.

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Videotaped and videoconference deposition of  
NANCY YOUNG, PH.D., taken by the Defendants pursuant to  
the West Virginia Federal Rules of Civil Procedure, in the  
above-entitled action, pursuant to notice, conducted  
virtually via Zoom, before Twyla Donathan, Registered  
Professional Reporter and Notary Public, on the 15th day  
of September, 2020.

1 4:07. Why don't we just plan on coming back at 4:40,  
2 Eastern time, 1:40 your time.

3 THE DEPONENT: 4:40. Got it.

4 VIDEOGRAPHER: The time is 4:08.  
5 We're now going off the record.

6 (A recess was taken.)

7 VIDEOGRAPHER: The time is 4:54.  
8 We're now back on the record.

9 BY MS. GEIST:

10 Q Did you have a nice lunch, Dr. Young?

11 A I did. I did my traditional get outside of  
12 the house and walk around the yard for at least ten  
13 minutes. So that was good.

14 Q Good for you. I'm jealous.

15 A Beautiful day outside.

16 Q I'm glad. Okay. So before the break, I  
17 had indicated to you that I wanted to shift now and  
18 talk to you about the cost estimates that you did in  
19 connection with your report. So it probably makes  
20 sense for us to start with page 8, and this is the  
21 chart, if you will, for Population 1, Pregnant Women  
22 With Opioid Use Disorder.

23 And then you have specific cost estimates  
24 for each of the five populations for which you are

1 suggesting interventions and programs; is that a fair  
2 overall summary?

3 A Yes, it is.

4 Q Okay. Now, in calculating the cost  
5 estimates for the interventions or programs you talk  
6 about for the five main populations, am I correct as  
7 I read your report that you did not attempt to review  
8 or determine the responsibility for Cabell County, if  
9 any, to pay for any of those interventions or  
10 programs?

11 A I looked at some of the budget data, but I  
12 did not. That was not what I was asked to do.

13 Q Okay. So just so I'm clear, you have cost  
14 estimates for each of the five populations in your  
15 report. You are not in any way providing opinions or  
16 making a determination as to what cost may be borne  
17 or shouldered by Cabell County-Huntington should any  
18 of these implementations occur; is that correct?

19 A That's correct.

20 Q And in calculating the cost estimates that  
21 are in your report, you did not take into account the  
22 current federal, state, other grant funding or  
23 existing programs paid by third parties and not  
24 Cabell County-Huntington; is that also correct?

1           A     That is true.

2           Q     Okay. And we had looked earlier at the  
3     City of Solutions document, A Guide to What Works and  
4     What Does Not, which has been marked as Exhibit 22,  
5     and you told me that you did not read this report and  
6     consider it in reaching your opinions, correct?

7           A     Correct.

8           Q     Are you aware that the City of Solutions  
9     Guide contains quite an extensive discussion of  
10    program costs, you know, per program that is and has  
11    been available to the five populations in your report  
12    in Cabell County?

13          A     I did not look at that specifically.

14          Q     Would that have been -- If you were aware  
15    that that information was there, would that have been  
16    important in forming your opinions with respect to  
17    cost estimates in Cabell County-Huntington, actually  
18    look at what the programs have cost and who has paid  
19    for them as outlined in the City of Solutions?

20                   MR. ARNOLD: Objection. Form.

21          A     Is the question would that have been  
22    important, or would that have been -- What was the  
23    question part of that?

24          Q     If you had known that there were actual

1 cost figures, data, reported in the City of Solutions  
2 document outlining the various programs, and from the  
3 City of Huntington's perspective, the success of  
4 those programs, if you had known that that included a  
5 discussion of costs, meaning how these programs have  
6 been paid and whether or not there is any  
7 out-of-pocket expense borne by Cabell  
8 County-Huntington, would that have been important in  
9 your opinions with respect to cost estimates?

10 A I definitely would have looked at those.  
11 But, again, in context of these programs have been  
12 put in place by federal grants that won't continue.

13 Q Well, we went over that earlier. So now  
14 I'm going to have to ask you another question.  
15 Federal grants that won't continue. You cannot say  
16 with certainty -- and again, you understand you're  
17 providing expert opinions in this case on behalf of  
18 Plaintiffs, correct?

19 A That's correct.

20 Q You understand you need to give your  
21 opinions with the requisite, you know, reasonable --  
22 strike that. You understand that you need to testify  
23 to your opinions with a reasonable degree of  
24 professional or scientific certainty? Do you